

WEIL, GOTSHAL & MANGES LLP  
Theodore Tsekerides (*pro hac vice*)  
(theodore.tsekerides@weil.com)  
Jessica Liou (*pro hac vice*)  
(jessica.liou@weil.com)  
Matthew Goren (*pro hac vice*)  
(matthew.goren@weil.com)  
767 Fifth Avenue  
New York, NY 10153-0119  
Tel: 212 310 8000  
Fax: 212 310 8007

KELLER BENVENUTTI KIM LLP  
Tobias S. Keller (#151445)  
(tkeller@kbbkllp.com)  
Peter J. Benvenutti (#60566)  
(pbenvenutti@kbbkllp.com)  
Jane Kim (#298192)  
(jkim@kbbkllp.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: (415) 496-6723  
Fax: (650) 636 9251

*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**STIPULATION BY AND BETWEEN  
REORGANIZED DEBTORS AND  
THE UNITED STATES OF AMERICA  
REGARDING DEADLINE FOR  
REORGANIZED DEBTORS TO  
OBJECT TO CLAIMS**

[No Hearing Requested]

PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as reorganized debtors (collectively, the “**Debtors**” and as reorganized pursuant to the Plan (as defined below), the “**Reorganized Debtors**”) in the above-captioned cases (the “**Chapter 11 Cases**”), on the one hand, and the United States of America, on behalf of various federal agencies (“**United States**,” and together with the Debtors and the Reorganized Debtors, the “**Parties**”), on the other hand, by and through their respective counsel, hereby stipulate and agree as follows:

### RECITALS

A. On January 29, 2019, the Debtors commenced these Chapter 11 Cases in the United States Bankruptcy Court for the Northern District of California (the “**Bankruptcy Court**”). The Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure.

B. By Order dated June 20, 2020 [Dkt. No. 8053] (the “**Confirmation Order**”), the Bankruptcy Court confirmed the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020* (as may be further modified, amended or supplemented from time to time, and together with any exhibits or schedules thereto, the “**Plan**”)<sup>1</sup>. The Effective Date of the Plan occurred on July 1, 2020. *See* Dkt. No. 8252. Pursuant to Section 7.1 of the Plan (as approved by Paragraph 31 of the Confirmation Order), the Reorganized Debtors may object to Claims until the later of (i) one hundred and eighty (180) days after the Effective Date (i.e., December 28, 2020) and (ii) such later date as may be fixed by the Bankruptcy Court for cause shown. Plan § 7.1.

C. On October 27, 2020, the Reorganized Debtors filed the *Motion for Entry of an Order Extending Deadline for the Reorganized Debtors to Object to Claims* [Dkt. No. 9355], which the Court granted with certain limited modifications in the *Order Extending Deadline for the Reorganized Debtors to Object to Claims* [Dkt. No. 9563] (the “**First Extension Order**”).

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<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Plan or Confirmation Order.

The First Extension Order extended the Reorganized Debtors' deadline under Section 7.1 of the Plan to object to Claims by one hundred eighty (180) days, through and including June 26, 2021. The First Extension Order extended the deadline for the Reorganized Debtors to object to **United States Claims**—defined therein as Class 4B Utility General Unsecured Claims of the United States that were identified by claim number and amount in Docket No. 9718, as required by the First Extension Order—through and including March 31, 2021.

D. On March 17, 2021, the Reorganized Debtors filed the *Motion for Entry of an Order Further Extending Deadline for the Reorganized Debtors to Object to Claims and for Related Relief* [Dkt. No. 10409] (the "**Second Extension Motion**"). The Second Extension Motion, which is scheduled to be heard by the Bankruptcy Court on April 7, 2021, noted that the Reorganized Debtors had been working to object to or resolve the United States Claims, and that a stipulation extending the March 31, 2021 deadline for objection to the United States Claims would be forthcoming.

E. To allow time for continued progress towards resolution of the United States Claims, the Parties believe that it will be mutually beneficial to further extend the deadline for the Reorganized Debtors to object to United States Claims, as set forth below.

**NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE BANKRUPTCY COURT TO ORDER, THAT:**

1. The objection deadline for the following United States Claims shall be July 30, 2021:

Agency	Claim No.	Amount
U.S. Forest Service	59493	\$1,973,925.39
U.S. Forest Service	59662	\$9,895,433.65
U.S. Forest Service	59712	\$19,466,029.49
National Park Service	63092	\$3,763,144.49
National Park Service	63748	\$14,170.15
Bureau of Land Management	62632	\$81,167.00
Western Area Power Administration	17112	\$2,281,500.00

2. The objection deadline for the following United States Claims shall be September 30, 2021:

Agency	Claim No.	Amount
U.S. Forest Service	59664	\$21,029,700.59
U.S. Forest Service	63837	\$76,554,779.75
National Park Service	63756	\$90,415.07

3. This Stipulation shall constitute the entire agreement and understanding of the Parties relating to the subject matter hereof and shall supersede all prior agreements and understandings relating to the subject matter hereof.

4. This Stipulation may be executed in counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same agreement.

5. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or controversies arising from this Stipulation or any Order approving the terms of this Stipulation.

Dated: March 25, 2021

KELLER BENVENUTTI KIM LLP

/s/ Jane Kim

Jane Kim  
*Attorneys for Debtors and  
Reorganized Debtors*

/s/ Matthew J. Troy

BRIAN M. BOYNTON  
Acting Assistant Attorney General  
Civil Division  
RUTH A. HARVEY  
Director  
KIRK MANHARDT  
Deputy Director  
MATTHEW J. TROY  
Senior Trial Counsel  
Attorneys for the United States